

August 15, 2025

VIA EMAIL: amy.malm@wisconsin.gov

Commissioner Nathan Houdek
Office of the Commissioner of Insurance
State of Wisconsin
Attention: Amy Malm, Division of Financial Regulation
Office of the Commissioner of Insurance
125 S. Webster Street, 2nd Floor
Madison, WI 53702

Re: Merger of Riverside Mutual Insurance Company with and into Central Wisconsin Mutual Insurance Company

Dear Commissioner Houdek:

The Boards of Directors of Riverside Mutual Insurance Company, a Wisconsin town mutual insurance corporation ("Riverside"), and Central Wisconsin Mutual Insurance Company, a Wisconsin mutual insurance corporation ("Central Wisconsin"), have approved the merger of Riverside with and into Central Wisconsin (the "Merger"). Pursuant to Wis. Stat. § 612.22, we are submitting for your review the documents and exhibits set forth below, and respectfully request your approval of the Merger.

Please find enclosed the following documentation:

<u>Attachment</u>	<u>Description</u>
1.	A certified resolution of the Riverside Board of Directors approving the Merger.
2.	A certified resolution of the Central Wisconsin Board of Directors approving the Merger.
3.	The executed Agreement and Plan of Merger, including the following exhibits: <u>Exhibit A:</u> The current Third Amended and Restated Articles of Incorporation of Central Wisconsin which will be the articles of incorporation of the surviving entity. <u>Exhibit B:</u> The current Amended and Restated Bylaws of Central Wisconsin which will be the bylaws of the surviving entity.

Exhibit C: The current directors of Central Wisconsin which will be the directors of the surviving entity.

Exhibit D: The current officers of Central Wisconsin which will be the officers of the surviving entity.

Exhibit E: The form of Certificate of Assumption and Endorsement which Central Wisconsin proposes to send to all Riverside policyholders after the effective time of the Merger.

Exhibit F: “Actual Cash Value Loss Settlement Terms for Roof and Exterior Surfacing” Endorsement.

4. A proposed summary of the Merger to be sent to Riverside policyholders with Riverside’s Notice of Special Policyholder Meeting.
5. The following Riverside-related documents:
 - (a) The most recent year-end annual statement for Riverside.
 - (b) The June 2025 monthly unaudited financial statements for Riverside. ***Submitted under separate cover; confidential treatment requested.***
 - (c) A proposed Notice of Special Policyholder Meeting to be sent to Riverside policyholders.
 - (d) The proposed policyholder resolution ballot to be presented in person at the special meeting.
 - (e) The proposed policyholder resolution ballots to be presented to the policyholders via mail pursuant to Wis. Stat. § 612.12(4)(c).
 - (f) The proposed report of policyholder votes to be submitted to the OCI following the special meeting.
6. The following Central Wisconsin-related documents:
 - (a) The most recent year-end annual statement for Central Wisconsin.
 - (b) The most recent quarterly statement for Central Wisconsin.

Please note, Riverside has tentatively scheduled an emergency special meeting for its policyholders on October 4, 2025. Accordingly, Riverside hopes to be able to complete the mailing by September 3, 2025, and respectfully requests that you provide preliminary approval for the policyholder mailings to be sent by the date. Please let us know if you have any concerns with this proposed timeline.

August 15, 2025

Page 3

Thank you for your attention to this matter. Should you have any questions or require additional information, please do not hesitate to contact either of us, Zach Bemis at (608) 284-2224 or by email at zbemis@gklaw.com, or Isabella Jarosz at (414) 287-9311 or by email at ijarosz@gklaw.com.

Sincerely,

GODFREY & KAHN, S.C.



Zachary P. Bemis



Isabella C. Jarosz

Enclosures

cc: Mr. Chris Martin, OCI (via email)
Ms. Kristin Forsberg, OCI (via email)
Denis Fuerstenberg, Central Wisconsin (via email)
Peggy Sue Langer, Riverside (via email)